

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46
Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**COMERICA BANK & TRUST, N.A.'S MEMORANDUM IN SUPPORT OF
MOTION TO FILE UNDER SEAL UNREDACTED VERSION OF JANUARY 11,
2021 CORRESPONDENCE TO THE HONORABLE KEVIN W. EIDE AND
EXHIBIT A TO THE CORRESPONDENCE**

Comerica Bank & Trust, N.A., as the Personal Representative of the Estate of Prince Rogers Nelson (the "Personal Representative"), submits this Memorandum in Support of its Motion to file the following documents under seal:

Unredacted version of Comerica Bank & Trust, N.A.'s January 11, 2021 Correspondence to The Honorable Kevin W. Eide; and

Exhibit A to the Correspondence

The Correspondence contains confidential information related to the Estate, including specifically, the status of legal proceedings involving the Estate and plans regarding the transition and administration of the assets of the Estate. Exhibit A includes the Estate's confidential financial performance and projections. The request to file the unredacted version of the Correspondence and Exhibit A under seal is supported by the need to maintain the confidentiality of information belonging to, or involving, the Estate and its assets. The filings contain information that qualifies as confidential information under Minn. R. Civ. P. 26.03(g), and there is no historical right of access to the information under the test articulated in *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986).

Accordingly, the Personal Representative respectfully requests that the Court permit it to file the unredacted copy of the Correspondence, and the entirety of Exhibit A, under seal.

Dated: January 11, 2021

/s/ Joseph J. Cassioppi

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